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RESPONSE TO PUBLIC COMMENTS DOCUMENT

CLASS 2 PERMIT MODIFICATION REQUEST
HAZARDOUS WASTE FACILITY PERMIT CLOSURE PLAN
HAZARDOUS WASTE MANAGEMENT FACILITY -- BLDG 029 and 133
SANTA SUSANA FIELD LABORATORY
AREA IV - USDOE/BOEING

February 16, 2006

INTRODUCTION

The Boeing Company (Boeing) submitted a Class 2 Permit Modification Request (Request) to the Department of Toxic Substances Control (DTSC) dated January 23, 2004. The request proposed updates and modifications to the Closure Plan for the Hazardous Waste Management Facility (HWMF) (Building 029 and Building 133) located in Area IV of the Santa Susana Field Laboratory (SSFL), Simi Hills, Ventura County, California. A 60-day Public Comment Period occurred from January 30 to March 30, 2004 which allowed the public to review and comment on Boeing's Request. Boeing held a public meeting on March 15, 2004. Upon public request, DTSC extended the public comment period by 30 days, ending on April 30, 2004.

After the Comment Period for the Permit Modification Request, DTSC developed an Initial Study under the California Environmental Quality Act (CEQA). The CEQA Initial Study investigates potential environmental impacts of the proposed closure plan. Based on the Initial Study, DTSC decided to prepare a draft CEQA Mitigated Negative Declaration which declares the project will not significantly impact the environment with the addition of mitigation measures. For the closure of the HWMF, mitigation measures were placed to provide additional protection to rare plant species known to be in the area of the soil borrow pit. A public comment period for the draft CEQA Mitigated Negative Declaration occurred from December 2, 2005 to January 17, 2006.

During both Public Comment Periods, DTSC received comments on a variety of issues. DTSC developed this "Response to Public Comments Document" to respond to those comments. This Response to Comments Document is issued along with DTSC's approval of the Class 2 Permit Modification Request and final Mitigated Negative Declaration for the Closure Plan of the Hazardous Waste Management Facility.

THE PERMIT MODIFICATION REQUEST

The Boeing Company requested modification to the Closure Plan of the Hazardous Waste Management Facility that operated under a RCRA Hazardous Waste Facility Permit.

THE FACILITY

The Hazardous Waste Management Facility consists of two separate sub-facilities: Building T029 and Building T133. Both sub-facilities are located in Area IV of the Santa Susana Field Laboratory.

Building T029 was used to store alkali metal waste and contaminated equipment generated from various research projects. When enough was available, the waste was transported to Building T133 for treatment. Some of the contaminated equipment was cut down to size. Then the waste and contaminated equipment was placed in a steel-lined chamber where it was heated

with natural gas and then sprayed with water. This process produced a caustic (high pH) waste water primarily potassium hydroxide (KOH) and sodium hydroxide (NaOH). The wastewater was collected in an open, below-ground tank and then pumped to an above-ground tank. The wastewater was transferred to a tank truck for offsite disposal.

THE PERMIT

The United States Department of Energy (DOE) and Rockwell International Corporation, later replaced by The Boeing Company, operated the Hazardous Waste Management Facility (HWMF) under a Hazardous Waste Facility Permit (Permit) issued by the Department of Toxic Substances Control (DTSC) under the authority of the Resource Conservation and Recovery Act (RCRA). The Permit became effective on November 30, 1993 and expired on November 30, 2003. (Permit 93-3-TS-002, EPA ID CAD000629972). The permit conditions remain enforceable until closure of the facility has been certified.

THE CLOSURE PLAN

DTSC issued the RCRA Permit on October 25, 1993 which incorporated, by reference, the permit application titled "*Operation Plan, Hazardous Waste Management Facility, Rockwell International Corporation, Santa Susana Field Laboratory, Energy Technology Engineering Center*", dated December 17, 1992. Section XIII of the permit application discussed the closure of the HWMF (the Closure Plan). The Closure Plan describes how the owner and/or operator will close a permitted facility once the facility is no longer needed.

THE PERMIT MODIFICATION REQUEST

The HWMF ceased operation in 1998. Boeing submitted a letter on July 21, 1998 notifying DTSC that the HWMF will cease operation immediately. The letter also stated that Boeing will submit a revised Closure Plan. DTSC reviewed and commented on several draft Closure Plans. On January 23, 2004, Boeing submitted a revised Draft Closure Plan and formally requested a Class 2 Permit Modification.

The 1993 Closure Plan and the 2004 Closure Plan do not differ much in scope. Both Closure Plans call for the removal of inventory, demolition of the structures, removal of the demolition debris off-site, verification of underlying soils and removal of impacted soils, if needed. The recently submitted updates and modifications primarily supplied details of the closure. For instance, the revised Closure Plan provided the number and locations of the verification samples, the specific transportation route for the demolition debris, an updated Health and Safety Plan for the workers, etc. Although the 1993 Closure Plan discussed all of these issues, the 2004 Closure Plan provided more details.

PUBLIC COMMENT PERIODS

A public comment period for the proposed 2004 Closure Plan modification occurred shortly after Boeing submitted the permit modification request. Boeing noticed the permit modification request by sending a notice to the facility public mailing list and publishing a notice in local newspapers. A 60-day comment period occurred from January 30 to March 30, 2004. Boeing hosted a public meeting on March 15, 2004. Upon public request, DTSC extended the public comment period for 30 days to April 30, 2004.

DTSC developed an Initial Study which looked at the potential environmental impacts of the proposed closure plan. Based on this Initial Study, DTSC decided to prepare a Draft Mitigated Negative Declaration to comply with the California Environmental Quality Act (CEQA). DTSC held a public comment period for the Draft Mitigated Negative Declaration from December 2, 2005 to January 17, 2006.

DTSC DETERMINATIONS

The Department of Toxic Substances Control approved the Closure Plan for the Hazardous Waste Management Facility and issued the final Mitigated Negative Declaration.

PUBLIC COMMENTS

DTSC received 4 public comment documents during the comment period for the proposed Closure Plan (January 30 to March 30, 2004) and received 5 public comments during the comment period for the draft Negative Declaration (December 2, 2005 to January 17, 2006).

Comments on the Proposed Closure Plan:

- **(Keyser)** Memo-of-Call: Call from Dorian Keyser, Vice President of Santa Susana Park Associates, call made to Stephen Baxter, Department of Toxic Substances Control. Call occurred February 23, 2004 Monday 10:20 AM. [Memo-of-Call written by Stephen Baxter]

- **(Hirsch-email)** Electronic-Mail: from Daniel Hirsch (CBGHisch@aol.com) to Stephen Baxter (sbaxter@dtsc.ca.gov) dated 3/30/2004 at 10:15 AM.

- **(Hirsch-letter)** Letter from Daniel Hirsch, President, Committee to Bridge the Gap, to Stephen Baxter, Department of Toxic Substances Control. Letter dated 30 March 2004.

- **(Einhorn)** Letter from David Einhorn, West Hills resident, to Steve Baxter, D.T.S.C. Letter dated 4-3-04.

Comments on the Draft Mitigated Negative Declaration:

- **(Harris)** Electronic-Mail: from Scott P. Harris (spharris@dfg.ca.gov) to Stephen Baxter (sbaxter@dtsc.ca.gov) dated 2005/12/21 00:01. Subject: Neg Dec for Sant [sic] Susana Field Lab IV Closure Plan. [Note: dfg.ca.gov for the California Department of Fish and Game]

- **(Lalani)** Memo from Nazir Lalani, Ventura County Public Works Agency Transportation Department to Carl Morehouse, Ventura County Planning Division, dated December 29, 2005 [Faxed JAN-13-2006 as faxed package of comments from Christopher Stephens, Ventura County Planning Division].

- **(Callaway)** Memo from Alicia Stratton, Ventura County Watershed Protection District to Carl Morehouse, Ventura County Planning Division, dated January 11, 2006 [Faxed JAN-13-2006 as faxed package of comments from Christopher Stephens, Ventura County Planning Division].

- **(Stratton)** Memo from Alicia Stratton, Ventura County Air Pollution Control District to Carl Morehouse, Ventura County Planning Division, dated January 10, 2006 [Faxed JAN-13-2006 as faxed package of comments from Christopher Stephens, Ventura County Planning Division].

- **(Panaro)** Memo from David Panaro, Ventura County Watershed Protection District to Carl Morehouse, Ventura County Planning Division, dated January 10, 2006 [Faxed JAN-13-2006 as faxed package of comments from Christopher Stephens, Ventura County Planning Division].

Responses to these comments are provided below. DTSC combined similar comments under a general heading. The name in the parentheses indicates the source of the comment. The comment numbering is for reference only. The following headings include:

COMMENT (1): CULTURAL HERITAGE SITES
COMMENT (2): WILDLIFE CORRIDORS
COMMENT (3): REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD
COMMENT (4): ACCESS TO DOCUMENTS IN DIGITAL FORMAT
COMMENT (5): CUMULATIVE IMPACTS / RADIOACTIVE CONTAMINATION
COMMENT (6): WASTE DISPOSAL
COMMENT (7): POTENTIAL FOR OTHER CONTAMINANTS
COMMENT (8): PROBLEM WITH PROTOCOL TO “REDUCE FALSE POSITIVE OCCURENCES”
COMMENT (9): BACKGROUND MEASUREMENTS
COMMENT (10): ADDITIONAL MEASURE FOR PROTECTING BRAUNTON’S MILK VETCH
COMMENT (11): DEMOLITION PERMITS
COMMENT (12): ASBESTOS RULES FOR DEMOLITION AND RENOVATION
COMMENT (13): DUST MITIGATION MEASURES
COMMENT (14): DUST AND SPILLAGE PREVENTION FOR MOVING VEHICLES

COMMENT (15): BIOLOGICAL RESOURCES MITIGATION MEASURES
COMMENT (16): HYDROLOGY AND WATER QUALITY
COMMENT (17): TRAFFIC ON COUNTY REGIONAL ROAD NETWORK

RESPONSE TO PUBLIC COMMENTS

COMMENT (1): CULTURAL HERITAGE SITES

(Keyser)
Mr. Keyser's primary concern is protection of the rock art and other Native American cultural heritage sites on the Boeing Property.

RESPONSE TO COMMENT (1):

The Santa Susana Field Laboratory contains native pictographs and other cultural sites. These are collectively known as cultural resources. The precise locations of these cultural resources are guarded to prevent looting and vandalism.

W and S Consultants (WSC) is a cultural resources management consulting firm located in Simi Valley. Dr. David S. Whitley, PhD is the owner of WSC and a Registered Professional Archaeologist. Boeing has retained WSC to survey and manage the cultural resources at SSFL.

DTSC queried Dr. Whitley concerning the possible impacts of the cultural resources due to the closure of the HWMF. Dr. Whitley responded with an electronic-mail dated March 29, 2004 and later with a signed letter dated 17 May 2005. In both, Dr. Whitley provides the following information.

> "My cultural resources management consulting firm, W and S Consultants, conducted a Phase I survey/Class III inventory of Area IV under my direction in September 2001. This involved an intensive on-foot survey of the entirety of Area IV, and it met both State of California (CEQA) and federal (NEPA) compliance standards and guidelines. I note that, as a principal investigator and project director for this study, I have a Ph.D. from UCLA specializing in California archaeology, 30 years professional experience, and I am a Registered Professional Archaeologist (RPA)."
>
> "Our 2001 archaeological study found no evidence for the presence of cultural resources of any kind at or in the vicinity of Buildings 4029 and 4133. The SSFL does contain a National Register of Historic Places archaeological site complex, known as the Burro Flats Pictograph Site. This is not located in Area IV and, in fact, is quite a distanced from the buildings in question."
>
> "Any activities at or adjacent to Buildings 4029 and 4133, including closure, demolition, grading and/or reconstruction, therefore do not have the potential to result in adverse impacts to cultural resources."

If contaminated soils are discovered and excavated, borrow soil may be taken from the on-site Area IV Soil Borrow Site. DTSC and Boeing asked Dr. Whitely to assess the Area IV Soil Borrow Site for possible impacts to cultural resources. Dr. Whitely submitted an additional letter dated 19 July 2005 that stated:

> "Our 2001 archaeological study found no evidence for the presence of cultural resources of any kind at or in the vicinity of the proposed borrow area [SSFL Area IV Borrow Zone]. Any activities at or adjacent to the borrow area, including grading and/or construction, therefore do not have the potential to result in adverse impacts to cultural resources."

The area around the HWMF has already been impacted by industrial use. From Dr. Whitley's remarks, there are no cultural resources in the vicinity of the HWMF. Dr. Whitley also determined that there are no cultural resources around the Area IV Soil Borrow Site. Therefore, the closure of the HWMF will not impact cultural resources.

COMMENT (2): WILDLIFE CORRIDORS

(Keyser)
Mr. Keyser expressed concerns on keeping wildlife corridors open.

RESPONSE TO COMMENT (2):

The Santa Susana Field Laboratory is zoned for industrial use. Two paved, main roads run through the facility from east to west. A number of paved and graded roads branch out to serve various areas. Still, many medium-size animals have been spotted in the SSFL area, including deer, coyote and rabbits. Both the southern Buffer Zone and the slopes north of SSFL are inaccessible to development and would provide habitat for animals.

The areas around both buildings of the Hazardous Waste Management Facility are within areas already impacted by industrial use. Closure of the HWMF involves demolition and removal of the buildings. Removal of these buildings would not harm any existing wildlife corridors. The closure of the HWMF does not require nor prevent the construction of new structures.

DTSC prepared documentation on environmental impacts to comply with the California Environmental Quality Act (CEQA). To address the impacts to Biological Resources, DTSC asked Boeing to conduct a biological survey by a competent person. A biological survey was performed on July 13, 2005 by Chris Dunn, Staff Biologist for Padre Associates, Inc. The survey report was dated August 4, 2005 and included the areas around Building 29, Building 133, and the Area 4 Soil Borrow Pit. The Survey did not find any direct impacts to wildlife. However, the Survey did recommend that another survey be performed just before construction began near Building 29 to identify and possibly remove any nesting birds and/or endangered reptiles that may have moved into the vicinity after the Survey was conducted. In addition, the Survey identified sensitive plants in the Area 4 Soil Borrow Site -- Braunton's milk-vetch. The survey recommended using orange construction fencing to visibly mark the location of the individual plants near the Area 4 Soil Borrow Site. DTSC incorporated the Survey's recommendations as required mitigation measures in the CEQA documentation.

The closure of the HWMF should not interfere with any existing wildlife corridors, nor will it necessarily improve the ability for wildlife to move through SSFL. The closure of the HWMF will be performed in a manner that protects any sensitive animals or sensitive plants found in the vicinity of the sites.

COMMENT (3): REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD

(Hirsch-email)
The Committee to Bridge the Gap hereby asks for an extension of the public comment period on the Boeing Corporation's Permit Modification Request for its Hazardous Waste Management Facility.

The Permit Mod. Request, as I understand, is quite large and extensive, extending over several volumes. The nearest copies of the request are hundreds of miles away from me. Even for people closer, practical availability for review is of minimal utility, as the copy cannot be checked out of the library and the ability to copy it is essentially non-existent, as the copy machines are 10 cents per page, operated by feeding them currency.

I have requested, through Lora Barrett, DTSC Public Participation Specialist, that at minimum an electronic copy be provided to me on CD so that I might review the detailed aspects of the Request. I and others have also asked that an electronic copy be posted on a website. Ms. Barrett informs me she has been working on some way of making the material more accessible such as through electronic copies, but there wasn't enough time and suggested that if this were a concern, I should request an extension of the comment period, which I hereby do.

RESPONSE TO COMMENT (3):

DTSC extended the comment period for 30 days. The 60-day comment period started on January 30 and was scheduled to end on March 30, 2004. DTSC extended the comment period 30 days to April 30, 2004.

DTSC replied to Mr. Hirsch's e-mail with an e-mail from Mr. Stephen Baxter, DTCS Glendale Office, dated April 5, 2004. The following is the portion of the e-mail reply concerning the time extension:

> "I [Stephen Baxter] received your e-mail on March 30, asking for an extension to the comment period for the subject review and also asking for access to an electronic version of the documents, either through our website or on a compact disc. The reviewing documents consist of the proposed Closure Plan and supporting documents submitted by The Boeing Company to the Department of Toxic Substances Control. DTSC has decided to extend the comment period until April 30 but is unable to provide electronic versions of the documents."
>
> "TIME EXTENSION:"
>
> "The regulations require at least a 60-day public comment period with a public meeting held no earlier than fifteen days after the beginning of the comment period and no later than 15 days before the end of the comment period. The Department of Toxic Substances Control can choose to extend the comment period at our discretion, although we could not reduce the length. The required 60-day public comment period began January 30, 2004 and ended on March 30. Within that time period, Boeing held the required public meeting on March 15, 2004."
>
> "DTSC has decided to grant your request to extend the public comment period for an additional 30 days, till April 30, 2004. We will also make this information known to others who have expressed a desire to review the information."

COMMENT (4): ACCESS TO DOCUMENTS IN DIGITAL FORMAT

(Hirsch-email)
The Permit Mod. Request, as I understand, is quite large and extensive, extending over several volumes. The nearest copies of the request are hundreds of miles away from me. Even for people closer, practical availability for review is of minimal utility, as the copy cannot be checked out of the library and the ability to copy it is essentially non-existent, as the copy machines are 10 cents per page, operated by feeding them currency.

I have requested, through Lora Barrett, DTSC Public Participation Specialist, that at minimum an electronic copy be provided to me on CD so that I might review the detailed aspects of the Request. I and others have also asked that an electronic copy be posted on a website. Ms. Barrett informs me she has been working on some way of making the material more accessible such as through electronic copies, but there wasn't enough time and suggested that if this were a concern, I should request an extension of the comment period, which I hereby do.

I therefore ask that the Department make available the Permit Mod. Request by posting an electronic copy on its website. If that is not possible, I ask a minimum that I be provided an electronic copy on CD. I request that the comment period be extended so as to conclude 45 days after the electronic copy is posted and/or otherwise provided. Thank you for consideration of this matter.

(Hirsch-letter)
As indicated in our comment extension request of this same date, [Committee to Bridge the Gap] had requested access to the full Permit Modification Request via it being posted electronically on the web or by being provided a CD containing it. DTSC has not yet been able to make it available in that fashion, so to date we have only seen a few pages of the Permit Mod. Request. We here submit preliminary comments on those few pages, while continuing to hope that our requests for access to the full document and an extension of the comment period will be granted.

RESPONSE TO COMMENT (4):

DTSC responded to Mr. Hirsch's e-mail with an e-mail from Mr. Stephen Baxter, DTSC Glendale Office, dated April 5, 2004. Portions of the e-mail are given below which respond to this comment.

> "I [Stephen Baxter] received your e-mail on March 30, asking for an extension to the comment period for the subject review and also asking for access to an electronic version of the documents, either through our website or on a compact disc. The reviewing documents consist of the proposed Closure Plan and supporting documents submitted by The Boeing Company to the Department of Toxic Substances Control. DTSC has decided to extend the comment period until April 30 but is unable to provide electronic versions of the documents."
>
> . . .
>
> "DOCUMENTATION IN ELECTRONIC FORMAT:"
>
> "The regulations require copies of documents under review to be placed in information repositories located near the facility. Three such repositories have been established: Simi Valley Library (2696 Tapo Canyon Road, Simi Valley), Platt Branch Library (23600 Victory Blvd., Woodland Hills) and CSU Northridge Oviatt Library (2nd Floor Room 265, Northridge). In addition, the DTSC Glendale Office (1011 North Grandview Ave, Glendale) is a fourth information repository that also manages the DTSC Administrative Record for activities overseen by the DTSC Glendale Office."
>
> "You requested that an electronic copy of the materials be posted or otherwise be provided to you. DTSC received a hard copy of the proposed Closure Plan for our review. We do not have the documents in electronic format."
>
> "Due to increased interest in providing material in electronic format, DTSC has begun investigating ways to have facilities submit their document in both a hard copy and electronic format. At this time, DTSC does not have any legal authority to require a facility to submit materials in electronic format. It is up to the facility to volunteer that resource. I recently asked The Boeing Company for an electronic copy of the proposed closure plan and they have declined. We are continuing our efforts, however, to pursue this issue for future documents."

DTSC extended the comment period from 60 days to 90 days. The documents were not provided in electronic format during the comment period.

COMMENT (5): CUMULATIVE IMPACTS / RADIOACTIVE CONTAMINATION

(Hirsch-letter)
Cumulative Impacts and Connected Actions not Examined: Radioactive Contamination not Fully Disclosed and not Evaluated:

The Executive Summary, at p. vii, states that both buildings that are subject to this Permit Modification Request, had contained radiological materials. At the meeting held by Boeing at Boeing's Recreational Center on March 15, it is my understanding that Boeing, when asked whether there were ever radioactive materials in these buildings, denied it. Nonetheless, the Permit Mod. Request states the opposite.

The Request indicates that Building T029 had been screened by DOE for radioactive contamination, and that Building T133 had been screened by Boeing and the results of the latter transmitted to DHS for review and approval in January 2004. Building T133 apparently had the potential for radioactive contamination in the sodium, NaK, and other reactor coolants dealt with in that building.

I have made repeated requests to DHS for copies of the radiological screening data and any requests by Boeing for approval of release of the remaining contamination. So far I have not received anything.

CEQA bars the artificial segmentation of environmental actions. We are concerned that by Boeing denying any past radioactive materials at the HWMF at the public meeting on the Permit Mod. Request, while the Request itself mentions the radioactive contamination of the HWMF while apparently providing no data or consideration of the matter, the public is being frozen out of full consideration of the proposed action. Furthermore, the true environmental impacts cannot be assessed and the cumulative or collective impacts considered.

We would respectfully suggest that DTSC require full disclosure in the Permit Mod. Request of the full environmental impacts of the proposed action, including all radiation data.

RESPONSE TO COMMENT (5):

The Hazardous Waste Management Facility (HWMF) received a hazardous waste facility permit to store and treat alkali metals. Alkali metals are classified as hazardous waste because they are dangerously reactive to air and water. Building 29 was permitted to store the alkali metal waste and Building 133 was permitted to treat the alkali metal waste. The HWMF (Building 29 and Building 133) was not permitted to store or treat radioactive material or any mixture of hazardous and radioactive materials (known as mixed waste). The approved sources of the alkali metals were:

1) spent and/or contaminated alkali metals from research/development of heat exchangers;
2) equipment from research/development that contained alkali metal residue;
3) surplus alkali metals that were never used; and
4) a one-time instance of abandoned sodium metal found in Butte County by local officials.

The Hazardous Waste Management Facility began operation in 1978 and received an operating hazardous waste facility permit in 1983. The hazardous waste permit was renewed in 1988 and 1993. The HWMF ceased operations in 1997 and the hazardous waste permit was left to expire on November 11, 2003.

Prior to being permitted as a hazardous waste storage facility, Building 29 was used to calibrate instrument for measuring radioactivity. Building 29 was used as the instrument calibration facility between 1959 and 1974. Building 29 was vacant between 1974 and 1978. According to documentation, all radioactive material was removed from Building 29 by April 1974. This included complete removal of source wells that had contained Ra-226. A radiation survey was performed at Building 29 in 1988 and then released for unrestricted use.

Building 133 at its present location did not handle radioactive materials. However, part of the facility's structure was previously used in another location where radioactive materials were handled. According to the recently completed document "Historical Site Assessment of Area IV" (May 2005), part of Building 133 was previously part of Building 724 in another location. Building 724 was known as the "Contaminated Sodium Facility" or "Hot Oil Sodium Cleaning Facility". Building 724 was used for cleaning large pipes and assemblies from the secondary loop of the SRE reactor. The building was decontaminated below release levels, cut away from the foundation, and moved to the Building 133 location where it became part of the structure. Boeing conducted an additional radioactive survey of Building 133 in 1999 and contained in a report "Building 4133 Radiation Survey Report" dated January 14, 2004. The California Department of Health Services reviewed Boeing's report and concurred with Boeing's finding that no radioactive contamination was found at Building 133.

The Executive Summary of the draft Closure Plan discusses the radioactive materials managed in Building 29 before being permitted as a hazardous waste-only facility. The Executive Summary does not state that radioactive material was handled at Building 133. However, the Executive Summary does discuss the radioactive survey performed by Boeing at Building 133. DTSC requested this survey because other, separate facilities located in Area IV handle radioactive material and there were lingering doubts that Building 133 may have unintentional contamination.

The files at the DTSC Glendale Office contain three documents pertinent to this discussion:

- Certification Docket for the Release of Building 029 at the Energy Technology Engineering Center, dated April 1997.

- Building 4133 Radiation Survey Report, dated January 14, 2004.

- Historical Site Assessment of Area IV Santa Susana Field Laboratory, dated May 2005.

The 1997 Certification Docket is a compendium of documents involving the closure of Building 029. The 2004 Survey Report discusses the 1999 radiation survey performed by Boeing on Building 133. The Historical Site Assessment gives additional details on buildings used by the U.S. Department of Energy at SSFL Area IV.

COMMENT (6): WASTE DISPOSAL

(Hirsch-letter)
Disposition of and Impacts of Waste Disposal from Proposed Action Not Sufficiently Disclosed or Evaluated

The Executive Summary (p. vii) says, "the T029 and T133 equipment and structures will be demolished and *removed for management at permitted offsite facilities...."* (emphasis added). As best we know, those "permitted offsite facilities" are not identified in the Permit Mod. Request, nor is there any disclosure as to whether these wastes will be "mixed wastes", i.e., containing mixtures of radioactive and chemical contaminants. Previous shipments of such wastes from SSFL to DTSC-permitted facilities such as Buttonwillow and CIWMB-permitted facilities such as Bradley, Sunshine Canyon, and Calabassas landfills created large outcries and raised substantial environmental questions that had not been evaluated in a CEQA compliant fashion.

We strongly urge requirement of revision to the Permit Mod. Request to provide full disclosure of the nature of the wastes and where they will go, and an evaluation of the environmental impacts arising there from.

(Einhorn)
I am sending you this letter to protest the Boeing Co. plan to use the Bradley landfill to dump miscellaneous debris from the above referenced project. See attached letter dated 3-25-04 & attached Daily News article (4-5-02) relating to the Boeing Co. dumping of radioactive waste at the Bradley landfill (pages 1 thru 5). Also see excerpts from Boeing's plan pages 6, 7 & 8 (map).

Until Boeing undertakes a complete exploration & cleanup of nuclear waste dumped at Bradley Landfill they <u>should not</u> be allowed to go ahead with dumping at Bradley.

RESPONSE TO COMMENT (6):

Closure of the HWMF involves the demolition and off-site disposal of all structures, concrete pads, asphalt paving and attached equipment. Section 8 of the Closure Plan discusses the demolition and sampling of the debris. In addition, an attached Transportation Plan discusses the off-site disposal options in Section 4 "Destination of Waste/Material".

Radioactive surveys of the facilities do not indicate any debris will be considered "mixed waste" or low-level radioactive debris. However, any facility that once handled radioactive materials would be classified as "decommissioned waste", regardless of survey results, and will be subject to additional disposal requirements outside the jurisdiction of DTSC.

Parts of both Building 29 and Building 133 will be designated as "decommissioned waste". During the comment period for the permit modification (January 30 - March 30, 1994) the Closure Plan and Transportation Plan indicated that all decommissioned waste would be sent to Bechtel Nevada Test Site in Mercury, Nevada. The Transportation Plan was later revised for the CEQA public comment period (December 2, 2005 - January 17, 2005) where decommissioned waste will be sent to a Class I hazardous waste landfill, most likely the Chemical Waste Management's Kettleman Hills Facility. Both of these disposal options are in step with current regulations and California Executive Order D-62-02 (Davis, September 2002).

COMMENT (7): POTENTIAL for OTHER CONTAMINANTS

(Hirsch-letter)
The Permit Mod. Request Should Address the Potential for Contamination by Many Other Contaminants, as Turned Out to be the Case with the Sodium Burn Pit

We note that the HWMF appears to have been used to "treat" sodium-contaminated equipment and materials. The former Sodium "burn pit" where similar treatment had earlier occurred turned out to be contaminated with significant numbers of both chemical and radioactive contaminants -- PCBs, perchlorate, heavy metals, VOCs, etc., even though none of these were supposed to have been treated in the burn pit. Therefore, a thorough examination of the potential for other contaminants in the HWMF and near it is essential.

RESPONSE TO COMMENT (7):

The Former Sodium Disposal Facility (FSDF) is located in the western end of Area IV of SSFL and was a completely separate operation from the Hazardous Waste Management Facility (Bldg 29 and Bldg 133) located in the northwestern area of Area IV. The FSDF ceased operation around 1977 before being required to obtain a RCRA Hazardous Waste Facility Permit.

The FSDF used a type of treatment known as "open burn / open detonation" or OB/OD. An OB/OD facility simply places the material on the ground or on specially constructed pads before igniting the material. Supplemental fuel is sometimes used to promote the burning. This type of operation is commonly used for highly reactive materials such as explosives and alkali metals. The FSDF area also burned flammable waste materials. At some point, radioactive material was either stored and/or spilled in the FSDF, resulting in contamination that was later removed as part of a separate cleanup action.

The HWMF began operation in 1978 under a RCRA Hazardous Waste Facility Permit issued by the Department of Toxic Substances Control. Unlike the FSDF, the waste stream for the HWMF was specified as alkali metals and equipment with alkali metal residues. The storage building and treatment chamber was permitted to only handle the approved waste streams. Periodic inspections were made by DTSC to determine compliance with all permit conditions and regulations.

The HWMF Closure Plan contains a table of chemicals known as the "List of Chemicals of Concern" (Table 7). These are the chemicals which will be included in various frequencies throughout the sampling at Building 29 and Building 133. They include:

sodium
potassium
lithium
zirconium
fluoride
pH
metals (including arsenic, chromium, nickel, lead, mercury, and others)
hexavalent chromium
total petroleum hydrocarbons (TPHs)
polyaromatic hydrocarbons (PAHs)
aromatic volatile organics: benzene, toluene, ethlybenzene and xylenes (BTEX)
semi-volatile organic compounds (SVOCs)

During early reviews of the HWMF Closure Plan, a suspicion was raised to the possibility that transformers containing polychlorinated biphenyls (PCBs) were stored in the vicinity of Building 133. However, Boeing did not have any documentation of such storage and DTSC could not find any credible evidences to support the storage and/or release of any PCB containing material. The Closure Plan does not contain testing for PCBs.

Perchlorate was used in Area I, II and III as part of the research and testing of rockets and rocket fuels. Area IV did not conduct rocket test-firing although some of the facilities in Area IV fabricated rocket engines and may have handled rocket fuels. The waste stream for the HWMF consisted of surplus alkali metals or waste alkali metals from research involving heat exchangers. Perchlorate is not one of the chemicals suspected to be present at HWMF. The Closure Plan does not contain testing for perchlorate.

The HWMF was not permitted to handle radioactive materials or hazardous waste contaminated with radioactive materials. According to documentation, the research of heat exchangers did not involve radioactive materials.

Prior to operating the HWMF, Building 29 was used to calibrate radioactive measuring instruments. Building 29 contained radioactive material "sources" of known activity which was used to calibrate the instruments. Prior to using Building 29, all radioactive sources were removed, the housing and wells for the radioactive sources were removed, and the building was decontaminated and certified cleaned for unlimited use. The Closure Plan does not include any additional sampling for radioactive contamination.

According to documentation, Building 133 did not handle radioactive waste or hazardous waste contaminated by radioactive material. However, parts of Building 133 were previously used at Building 724 as a cleaning facility for radioactive contaminated equipment. Both U.S. Department of Energy (USDOE) and the California Department of

Health Services Radiological Branch (CDOHS) considered Building 133 as a non-radioactive material handling facility. DTSC asked Boeing to perform a radioactive survey on Building 133 to answer lingering suspicions that areas of Building 133 may have been incidentally contaminated by radioactive material. Boeing performed the survey which showed no radioactive contamination. The survey report was reviewed by CDOHS who concurred with the report's conclusions. The Closure Plan does not contain any additional sampling for radioactive constituents.

COMMENT (8): PROBLEM WITH PROTOCOL TO "REDUCE FALSE POSITIVE OCCURENCES"

(Hirsch-letter)
The Permit Mod Request Proposes Troubling new Protocols to "Reduce False Positive Occurrences" for Groundwater Monitoring for Perchlorate

Boeing proposes very worrisome steps to throw out "hits" for contaminants such as perchlorate. These proposals appear to heavily bias measurements. If anything, there should be a bias to avoiding "false negative" readings. We believe these proposed Boeing procedures should be rejected and more credible techniques, not biased as is evident in their proposal, adopted.

RESPONSE TO COMMENT (8):

DTSC reviewed the HWMF Closure Plan and did not find any predetermined procedure for disregarding data that was not otherwise part of the standard data verification process for all environmental sampling events, including at SSFL. DTSC did find a passage in Section 2 which Comment 8 may be referring to.

Section 2.3.3 of the proposed HWMF Closure Plan discusses the groundwater quality around Building 133. A nearby well, designated as RS-25, was sampled in April 2003 when the usually dry well had accumulated enough groundwater to allow sampling. According to the Closure Plan, perchlorate was detected at the very limit of detection. However, perchlorate was not detected when the well was resampled with a lower detection limit. It must be noted that perchlorate is not a chemical that was used at Building 133 or expected to have been used at Building 133. Detecting perchlorate at these low levels (microgram per kilogram, roughly parts per billion) has been very problematic. The additional sampling protocols mentioned in the HWMF Closure Plan were developed to address the problems measuring perchlorate near detection levels.

Measurement errors are unavoidable. Additional steps and protocols are employed to reduce the size of the errors, but it is impossible to completely eliminate them. When sampling environmental media, two types of "false reading" errors are discussed -- false positives and false negatives.

A false positive occurs when a measurement says a chemical is present when it is not. False positives can occur when the analysis cannot easily distinguish between two chemicals and mistakes a chemical in the sample with another chemical that is not in the sample. False positives can also occur when samples are mishandled and a contaminant is erroneously introduced into a sample. False positives can also be the result of laboratory contamination. False positives waste time and resources that would otherwise be spent on other areas with actual contamination.

A false negative occurs when a measurement does not detect the presence of a chemical that is present. False negatives can occur when the concentration of the chemical is below the ability to detect it (the "detection limit") or when another chemical interferes with the measurement. False negatives can also occur when the sample is mishandled, such as allowing volatile chemicals to evaporate from the sample before testing, or allowing organic chemicals to naturally degrade before testing. False negative samples may leave behind chemicals that are above safety concerns.

It is equally desirable to eliminate all false readings; both false positives and false negatives. Procedures for limiting false readings are similar for both. Methods are established for extracting, storing and transporting the sample which increases the precision of the measurement and lowers the detection limit. Other methods are developed to eliminate loss of contaminates that are in the sample, to avoid introduction of contaminants that are not in the sample, and to preserve the sample while transporting. Quality control samples are used to check the laboratory. Special samples are created that either have no contamination (blanks) or have a known level of contamination (spikes). These quality-control samples are then sent to the laboratory along with the other samples which are processed by the

laboratory at the same time.

Sampling for the HWMF Closure Plan will use standard methods and protocols designed to limit, and hopefully eliminate, both false positive and false negative readings. These standard methods and protocols have been documented in the Sitewide Risk Assessment Methodolgy Guidance for Santa Susana Field Laboratory (SRAM). The HWMF Closure Plan referenced the June 2000 SRAM and the 2003 Revised SRAM. A Final SRAM dated September 2005 has been approved and will be used to close the HWMF.

COMMENT (9): BACKGROUND MEASUREMENTS

(Hirsch-letter)
Boeing Proposes Very Few "Background" Measurements, Biasing Results

As we understand it, only six samples were chosen to establish background levels. The number is too small to create a reliable enough range of background to avoid setting background levels (with error margins) that are artificially high, permitting contaminants to thus not be cleaned up. We are also concerned about the locations chosen, as they appear potentially affected by the SSFL activities at issue.

RESPONSE TO COMMENT (9):

Mr. Hirsch did not provide a reference for this comment and DTSC was unable to locate a reference in the proposed Closure Plan.

The HWMF Closure Plan proposes a total of 15 soil borings for the Building 29 area and 38 soil borings for the Building 133 area. Most of these borings will be going down to the alluvium/bedrock interface. Some of these borings will have multiple samples per boring. Details are presented in Section 9 and elsewhere in the proposed HWMF Closure Plan.

A document has been developed to provide a consistent methodology for creating site-specific health risk assessments as well as establishing background statistics. This document is titled "Standardized Risk Assessment Methodology Manual", or SRAM. The SRAM includes the establishment of background. Background levels use samples taken from various areas of SSFL that have not been impacted. The SRAM provides a consistent procedure for establishing background for each site. The proposed Closure Plan referenced the June 2000 SRAM and the 2003 Revised SRAM. A Final SRAM dated September 2005 has been approved and will be used to close the HWMF.

COMMENT (10): ADDITIONAL MEASURES FOR PROTECTING BRAUNTON'S MILK VETCH

(Harris)
Please consider implementing the below additional mitigation measures for impacts to bio resources as conditions for project approval for the closure plan for the above referenced project:

Impacts to Sensitive Biological Resources

1. Braunton's Milk Vetch - The [Initial Study] states that Braunton's milk vetch (BMV), a federally listed endangered plan, was discovered at and near the borrow pit during botanical surveys, the latest survey being conducted on July 13, 2005. The IS proposes that all BMV plants and potential seed bed in the vicinity of the plants be avoided by all project activities and equipment at the borrow pit.

a. The Department [of Fish and Game] concurs that avoidance of BMV is the preferred measure to avoid take of this plant species.

b. The Department recommends annual surveys for MV prior to project commencement to document any additional plants which may occur within the project study area to facilitate take avoidance.

c. The Department recommends dust control measures be implemented on the project site in the vicinity of

BMV. Deposition of dust on BMV from vehicle/equipment use at the borrow pit and haul road may compromise general BMV plant health, interfere with pollination and seed production and increase soil fertility which may encourage invasive exotic plant competition.

[d.] The Department recommends that the borrow pit and haul road be revegetated with native species to facilitate recovery of these areas and to avoid colonization by exotic invasive plant species which may adversely compete with BMV.

RESPONSE TO COMMENT (10):

The mitigation measures placed in the draft Negative Declaration is based on conversation with Boeing and a biological survey (report dated August 4, 2005) performed by Chris Dunn, Staff Biologist for Padre Associates, Inc. The biological survey was performed to support the CEQA Initial Study.

Response to 10a: Mitigation measures in the draft Mitigated Negative Declaration requires marking, identifying and informing workers of the presence of BMV for the purpose of avoiding incidental impacts.

Response to 10b: The closure of the Hazardous Waste Management Facility is expected to proceed within one year of the decision. Use of borrowed soil from the Soil Borrow Pit would only be necessary if excavations are performed at the project site and borrow soil is needed to finish grading. Based on your suggestion, DTSC has added a mitigation measure to update the biological survey of the Soil Pit Area for sensitive plant species prior to using the Soil Borrow Pit. This will be in addition to the two mitigation measures already included in the Mitigated Negative Declaration (construction fencing and worker notification).

Response to 10c: The Closure Plan discusses the closure schedule in Section 13 and in Table 17. The entire project is expected to be completed within 26 weeks assuming some impacted soil will be removed. If required, excavation of impacted soil would be done within 7 weeks. Only a fraction of this time would be needed to excavate and move soil from the Soil Borrow Pit. If the project needed to access the Soil Borrow Pit, the dust generation from using the Soil Borrow Pit would be very short in duration. From discussions with Boeing, the soil in the Soil Borrow Pit is not prone to generate dust. In response to the concern raised by California Department of Fish and Game, DTSC has added a mitigation measure in the Negative Declaration instructing Boeing to perform dust-suppression measures if dust is being generated that is visible and/or would impact worker health. That level should be low enough to protect vegetation from soil dusting even if soil continued to be excavated for other projects. In addition, Boeing's grading permit for the Soil Borrow Area requires dust control when dust is being produces or when speeds exceed 25 mph. If dust suppression efforts are not sufficient, then the grading permit requires dust-generating activities to temporarily stop until the winds abate.

Response to 10d: The Soil Borrow Pit was established to provide for soil throughout the Santa Susana Field Laboratory. Closure of the HWMF may not need to use borrow soil. Other projects under and not under DTSC jurisdiction may also borrow soil. DTSC will inform Boeing of the suggestion to revegetate the area with native species when the Soil Borrow Pit is no longer used. It would be outside this project and DTSC jurisdiction to enforce long-term care and protection of BMV throughout the entire SSFL area. It should be noted that DTSC's decision on this project does not prevent nor supersede other requirements from other regulatory agencies in this matter.

COMMENT (11): DEMOLITION PERMITS

(Stratton)
District staff concurs with the findings of the air quality section of the negative declaration that significant air quality impacts will not result from the project. Section 7(b) [of the CEQA Initial Study] addresses potential asbestos exposure and adherence to standard removal procedures. We recommend this be expanded to include the following: ...

Although the project is not expected to result in any significant local air quality impacts, the district recommends the following conditions be placed on the permit to minimize possible exposure to asbestos during demolition activities on the former project site:

1. The applicant shall be required to notify APCD prior to issuance of demolition permits or the demolition of any onsite structures. ...

RESPONSE TO COMMENT (11):

Section 8.2 of the proposed Closure Plan describes procedures for demolishing Building 29 and 133. The proposed Closure Plan does not specifically mention obtaining a demolition permit. District Rule 62.7 (attached to Ms. Stratton's memo) appears to require a demolition permit if asbestos-containing material is present.

Boeing and Boeing's contractor(s) are required to satisfy all applicable and appropriate laws and regulations as part of the approval of the Closure Plan. DTSC has placed a reminder in the approval letter to Boeing.

COMMENT (12): ASBESTOS RULES for DEMOLITION and RENOVATION

(Stratton)
District staff concurs with the findings of the air quality section of the negative declaration that significant air quality impacts will not result from the project. Section 7(b) [of the CEQA Initial Study] addresses potential asbestos exposure and adherence to standard removal procedures. We recommend this be expanded to include the following:

Although the project is not expected to result in any significant local air quality impacts, the district recommends the following conditions be placed on the permit to minimize possible exposure to asbestos during demolition activities on the former project site:

1. ... Demolition and/or renovation activities shall be conducted in compliance with APCD Rule 62.7, *Asbestos -- Demolition and Renovation* (attached).

RESPONSE TO COMMENT (12):

Section 8.2 of the proposed Closure Plan describes procedures for demolishing Building 29 and 133. Section 8.2.2 states:

> *"8.2.2 Asbestos Survey. An asbestos survey will also be performed prior to demolition tasks. If asbestos is confirmed present, then a certified asbestos removal contractor will be used to remove the asbestos containing materials. These materials will be segregated from other non-asbestos materials for offsite disposal."*

The text does not specifically state the laws and regulations that asbestos removal contractor will follow. Boeing and Boeing's contractor(s) are required to satisfy all applicable and appropriate laws and regulations as part of the approval of the Closure Plan. DTSC has placed a reminder in the approval letter to Boeing.

COMMENT (13): DUST MITIGATION MEASURES

(Stratton)
District staff concurs with the findings of the air quality section of the negative declaration that significant air quality impacts will not result from the project. Section 7(b) [of the CEQA Initial Study] addresses potential asbestos exposure and adherence to standard removal procedures. We recommend this be expanded to include the following:

Although the project is not expected to result in any significant local air quality impacts, the district

recommends the following conditions be placed on the permit to minimize possible exposure to asbestos during demolition activities on the former project site:

In addition to this, we recommend the following dust minimizing measures to be applied to all phases of the project that may generate excessive fugitive dust:

2. **During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with the APCD in determining when winds are excessive.**

4. **All unpaved on-site roads shall be periodically watered or treated with environmentally-safe dust suppressants to prevent excessive amounts of dust.**

5. **All active portions of the site shall be either periodically watered or treated with environmentally-safe dust suppressants to prevent excessive amounts of dust.**

6. **Construction equipment engines shall be maintained in good condition and in proper tune as per manufacturers' specifications.**

RESPONSE TO COMMENT (13):

Boeing submitted a Health and Safety Plan (HASP) supporting the Closure Plan. The HASP describes worker safety. Dust control is discussed in Section 4.3 of the HASP.

> "*Dust monitoring will be done to determine whether respiratory protection is needed during demolition tasks. Dust that is visible to the naked eye should be controlled with slower more deliberate moves of the demolition crew or water spray. If these concentrations can not be controlled, dust monitoring with a meter will be required. Concentrations of greater than 5 mg/m3 in the worker's breathing zone are unacceptable and will require the use of respiratory protection. Concentrations as high as 10 mg/m3 will require work to stop and the project approach re-evaluated to better control dust.*"

This dust control would occur after the structures have been surveyed and cleared of any asbestos. All other roads are paved and would not present a dust hazard. Dust control measures have been added for the soil borrow area.

COMMENT (14): DUST and SPILLAGE PREVENTION for MOVING VEHICLES

(Stratton)
District staff concurs with the findings of the air quality section of the negative declaration that significant air quality impacts will not result from the project. Section 7(b) [of the CEQA Initial Study] addresses potential asbestos exposure and adherence to standard removal procedures. We recommend this be expanded to include the following:

Although the project is not expected to result in any significant local air quality impacts, the district recommends the following conditions be placed on the permit to minimize possible exposure to asbestos during demolition activities on the former project site:

In addition to this, we recommend the following dust minimizing measures to be applied to all phases of the project that may generate excessive fugitive dust:

3. **All trucks that will haul excavated or graded material off site shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (c)(2) and (c)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.**

RESPONSE TO COMMENT (14):

Boeing submitted a Transportation Plan to supplement the Closure Plan for the Hazardous Waste Management Facility. Section 5 of the Transportation Plan mentions that the "*selected transporter(s) will be qualified, fully licensed and insured to transport the waste generated.*" The Transportation Plan also states:

> "*The contaminated soil and demolition debris removed from the HWMF will be hauled by trucks from the Site to the appropriate disposal facility, depending on the properties of the waste stream. Wastes will be transported in closed-top roll-off bins, each with a capacity of 20 to 25 tons or using 18-wheel end dump trucks, or equivalent, each having an approximate capacity of 20 to 25 tons material. Each dump truck box will be covered and secured with a tarp prior to leaving the Site.*"

Boeing and Boeing's contractor(s) are required to satisfy all applicable and appropriate laws and regulations as part of the approval of the Closure Plan. DTSC has placed a reminder in the approval letter to Boeing.

COMMENT (15): BIOLOGICAL RESOURCES MITIGATION MEASURES

(Callaway)
Comments from the [Ventura County] Watershed Protection District concerning the above are as follows:

ENVIRONMENTAL SERVICES

Biological Resources mitigation measures need to be made requirements of the project, not just recommendations. The document needs to provide additional mitigation (i.e. seasonal restrictions on the work) if nesting birds are found. Also, oak tree fencing needs to be placed at least six feet outside the oak tree drip line for adequate protection of the root zone.

WATER QUALITY: No Comment.
WATER RESOURCES: No Comment.
PLANNING AND REGULATORY: No Comment.

RESPONSE TO COMMENT (15):

The mitigation measures placed in the draft Negative Declaration is based on conversation with Boeing and a biological survey (report dated August 4, 2005) performed by Chris Dunn, Staff Biologist for Padre Associates, Inc. The biological survey was performed to support the CEQA Initial Study. The recommendations from the Biological Survey were adopted as mitigation measures in the Mitigated Negative Declaration and become enforceable requirements of the project under the California Environmental Quality Act. Language in the Mitigated Negative Declaration has been changed to clarify this aspect of the mitigating measures. In addition, DTSC's decision to approve the Closure Plan will add the mitigation measures as conditions of the approval.

The mitigation measures for nesting birds and oak trees referred to Building 29. The Biological Survey's recommendation for Building 29 stated the following:

> "***Recommended Conservation Measures*** *...* ***Building 29****. Due to the presence of potential nesting habitat for birds and sufficient leaf-litter to provide habitat for legless lizard habitat, we recommend at least one (1) pre-construction survey for nesting birds and legless lizard at the Building 29 site. If any partially built nests (determined by a qualified biologist) are found within 100 feet of the site, they should be removed to prevent breeding and take of migratory birds. Any special-status reptiles found during the pre-construction survey should be captured and relocated to suitable habitat areas outside of the project site. Oak trees located directly adjacent to the building and asphalt driveway (which also requires removal) should be protected in place with orange construction fencing."*

The related mitigation measure in the Mitigation Negative Declaration has been expanded to add the contingency for finding nesting birds and/or legless lizards.

DTSC added a clarification that the fencing around the oak trees should be placed at least six feet outside the oak tree drip line **when feasible**. Some of the oak trees, however, are alongside the structure and/or pavement which will be removed as part of the Closure Plan. Working within some of the oak tree's drip line will be unavoidable.

COMMENT (16): HYDROLOGY and WATER QUALITY

(Panaro)
We [David Panaro, R.G., Ventura County Watershed Protection District] have reviewed the Initial Study Environmental Setting -- Impact Analysis Section No. 8 Hydrology and Water Quality for Item b.) and item f.) both of which are considered No Impact (N) for Findings of Significance. We concur with these findings of the Initial Study-Negative Declaration Impacts and have no further comments regarding the above Issues.

RESPONSE TO COMMENT (16):

Comment noted.

COMMENT (17): TRAFFIC on COUNTY REGIONAL ROAD NETWORK

(Lalani)
Our [Nazir Lalani, Ventura County Public Works Transportation Department] comments are as follows:

1. **The MND [Mitigated Negative Declaration] indicates that the traffic generated by this project is temporary construction truck traffic. An average of 200 trucks trips may be required a part of this project. The estimated duration of truck activities is estimated to be 13 weeks. The maximum truck trip for any day is estimated at 39 trucks per day. Therefore, this project will not have any site-specific or cumulative impacts from permanent trips.**

2. **This project may include approximately 2,000 CY [cubic yard] of cut and 2,000 CY of fill to be hauled from and to the site. The construction trips related to exporting/importing material could have an adverse impact on the level of service and safety of the local County roadways, in particular Black Canyon Road, Katherine Road, Santa Susan Pass Road, and Box Canyon Road. The MND should be revised to include a condition that the local roads in the unincorporated area shall not be used as haul routes, in particular Black Canyon Road and Box Canyon Road.**

Our review is limited to the impacts this project may have on the County's Regional Road Network.

RESPONSE TO COMMENT (17):

Boeing submitted a Transportation Plan to supplement the Closure Plan for the Hazardous Waste Management Facility. Section 9 of the Transportation Plan gives the following route for trucks carrying debris and soil from SSFL.

> "***Primary Route to the 118 Freeway:*** *Beginning at the Site gate [at the top of Woolsey Canyon Road], turn right on Woolsey Canyon Road (easterly direction), turn right on Valley Circle Boulevard (southerly direction), turn left on Roscoe Boulevard (westerly direction), and turn left on Topanga Canyon Boulevard (northerly direction). The entrance to the 118 Fwy is on Topanga Canyon Boulevard. ... The route between the Site and 118 Fry will also be used in the event imported soil is required for the project.*"

The Transportation Plan also proposes alternate routes; heading south on Topanga Canyon Boulevard to the 101 Freeway or using De Soto Avenue instead of Topanga Canyon Boulevard to reach the 118 Freeway. Black Canyon Road (and connecting Katherine and Santa Susana Pass Roads) and Box Canyon Road are not used as primary or alternate routes.